

## **EXHIBIT 35**

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 FRIDAY, JULY 14, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 - - -

20 Remote videotaped deposition of  
21 Jonathan Schwartz, held remotely at the  
22 location of the witness in New York, New  
23 York, commencing at 9:34 a.m. Eastern Time,  
24 on the above date, before Carrie A. Campbell,  
25 Registered Diplomate Reporter and Certified  
Realtime Reporter.

- - -

26 GOLKOW LITIGATION SERVICES  
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28 deps@golkow.com

1 time?

2 MS. SHAPIRO: Objection.

3 QUESTIONS BY MR. WOHLGEMUTH:

4 Q. You can answer, sir.

5 A. So there were particularly  
6 New York Post and Daily Mirror -- Daily  
7 Mirror? I'm not -- Daily Mail, sorry,  
8 stories in that time frame, in early 2011,  
9 that reported on connections to people like  
10 from -- between Epstein and people like  
11 Prince Andrews -- Prince Andrew, sorry, in  
12 the UK. And in those stories were references  
13 to there being new investigations of Epstein.

14 That's what I -- that's  
15 essentially what I recall, just there were  
16 celebrity connections being made, famous  
17 people connections being made, and reporting  
18 on new investigations.

19 Q. Did you understand that  
20 Mr. Staley also had a relationship with  
21 Mr. Epstein in this time period, 2011?

22 A. I knew they had a business  
23 relationship. I didn't -- I don't have a  
24 recollection of understanding anything more  
25 than that or any of the details of their

1 relationship.

2 Q. I think I know the answer to  
3 this question, but were you aware of the  
4 number of accounts that Mr. Epstein had at  
5 JPMorgan?

6 A. Not at all.

7 Q. Okay. Were you able to  
8 access -- strike that.

9 Did you access any account  
10 activity associated with any Epstein account  
11 while you were working on these  
12 Epstein-related issues?

13 A. No.

14 Q. Did Steve Cutler -- well,  
15 strike that.

16 I take it Steve Cutler never  
17 asked you to review any Epstein account  
18 activity?

19 A. I do not believe Steve asked me  
20 to do that. He wasn't his client of the  
21 investment bank to begin with.

22 Q. Are you aware of Steve Cutler  
23 ever directing anyone to review Epstein's  
24 account activity?

25 A. I don't have any knowledge

1           A.       I guess I'd leave that to  
2 others to judge.

3           Q.       And what do you recall  
4 Mr. Lefkowitz telling you?

5                   Well, strike that.

6                   What did you ask Mr. Lefkowitz?

7           A.       I don't have a clear  
8 recollection of the conversation, but, again,  
9 as part of the prep for today, you know, I  
10 saw an e-mail in which I'm reporting on that  
11 conversation.

12                   When I saw that e-mail, that  
13 jogged my memory of, you know, what is  
14 reported in the e-mail. That's sort of the  
15 extent of my recollection.

16                   I don't have the e-mail in  
17 front of me, but it was to the effect of me  
18 asking Jay about whether there was an active  
19 investigation. That was the question, you  
20 know, that Cutler and others wanted to see if  
21 we could get an answer to.

22                   And he reported, you know, that  
23 to his knowledge there was not an active  
24 investigation of his client.

25                   But as you would expect someone

1 sophisticated like him to say, you know, we  
2 don't necessarily know. We wouldn't  
3 necessarily know. A kind of, I don't think  
4 so. We probably know, but we don't think so,  
5 anything is possible. Something to that  
6 effect.

7 Q. I just want to make sure I  
8 understand the testimony you just gave.

9 Is it fair to say that  
10 Mr. Lefkowitz couldn't definitively rule out  
11 the absence of an investigation?

12 MR. GAIL: Objection.

13 THE WITNESS: I think that --  
14 you stated that maybe...

15 QUESTIONS BY MR. WOHLGEMUTH:

16 Q. Oh, yeah. Yeah. I meant to  
17 say existence.

18 Is it fair to say that  
19 Mr. Lefkowitz couldn't definitively rule out  
20 the existence of an investigation?

21 A. That is what I recall him  
22 saying. Not in those words, but he said it  
23 was possible, but he didn't think so, that  
24 there -- didn't think that there was an  
25 investigation, but he couldn't know for sure.